



1 important cases of constitutional law during that time. The  
2 firm represented and represents numerous clients of varied  
3 social, political, religious, or other nature in cases  
4 involving issues of civil, political, or religious freedom  
5 rights.

6 4. I became a partner in the firm on July 1, 1977, and a  
7 named partner in the firm on July 1, 1979. I presently am one  
8 of the two senior partners in the firm. Mr. Boudin died in  
9 November, 1990. Mr. Rabinowitz remains active in the firm as  
10 of counsel.

11 5. I am general counsel to two national civil liberties  
12 organizations: the National Emergency Civil Liberties  
13 Committee (founded in 1951), and the Bill of Rights Foundation  
14 (founded in 1968). In addition, I serve as one of two  
15 litigation counsel to the Electronic Frontier Foundation, a  
16 recently founded civil liberties organization dedicated to the  
17 protection of First Amendment and other civil liberties rights  
18 in the emerging field of computer and electronic  
19 communication. I have served as a member and as chairman of  
20 various committees of local bar associations dealing with  
21 issues of civil rights and civil liberties. I have argued  
22 scores of cases involving civil liberties and constitutional  
23 issues in the federal courts of appeals, state appellate  
24 courts, and the Supreme Court.

25 6. Starting in about 1977, Leonard Boudin and my firm  
26 were retained by the Church of Scientology of California and  
27 by L. Ron Hubbard and Mary Sue Hubbard to represent them in  
28 various litigation matters. Over the ensuing years, the firm

1 has represented various Churches of Scientology in connection  
2 with a host of legal cases. The common thread in these cases  
3 has been the protection of the rights of the Churches and  
4 their members under the Bill of Rights. In many of these  
5 cases, we have been successful before the courts. In others,  
6 it is my frank opinion that the courts failed to uphold their  
7 constitutional obligations to protect the rights of what the  
8 courts perceive to be a non-conventional and minority  
9 religious movement. In the course of this representation, I  
10 have found that the litigation opponents of the Church,  
11 including and especially the agencies of the United States  
12 government, have engaged in improper, virulent attacks upon  
13 the Churches, the Scientology religion, and even upon counsel  
14 who deign to represent the Churches. The conduct is  
15 reminiscent of the conduct engaged in by government and  
16 private litigants 30 and more years ago against victims of  
17 McCarthyism.

18 7. In all the years of my firm's representation of  
19 Churches of Scientology, we have meticulously upheld and  
20 followed all standards of ethical conduct and propriety. My  
21 firm quite properly has earned a reputation in the courts and  
22 within the profession for the highest degree of professional  
23 competence and integrity. This reputation not only is the  
24 firm's greatest asset, but is also the greatest asset we can  
25 bring to the representation of our clients, including the  
26 Churches. Never in all the years of our representation of the  
27 Churches of Scientology has a Church representative ever  
28 requested, suggested or implied that we should depart from our

1 high standards of ethical and professional conduct. Indeed,  
2 the very fact that the Churches have continued to retain us in  
3 various litigation matters over all these years demonstrates  
4 their understanding of an agreement with our commitment to  
5 follow such high professional standards.

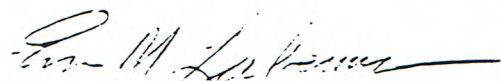
6 8. I take very seriously and am highly offended by any  
7 suggestions that my firm, or attorneys associated as co-  
8 counsel with my firm, engage in improprieties. As Othello  
9 said:

10 Who steals my purse steals trash; 'tis  
11 something, nothing;  
12 'Twas mine, 'tis his, and has been slave  
13 to thousands;  
14 But he that filches from my good  
15 name  
16 Robs me of that which not enriches  
17 him,  
18 And makes me poor indeed.

19 Othello, Act III, Scene 3, Line 155. I cannot permit opposing  
20 litigants to take the good name of myself, my firm, my co-  
21 counsel, or my clients.

22 I declare under the penalty of perjury that the foregoing  
23 statements are true and correct.

24 Executed this 16<sup>th</sup> day of October, 1991, in Los Angeles,  
25 California.

26   
27 Eric M. Lieberman  
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